

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KARL HANSEN,

Plaintiff,

v.

**ELON MUSK; TESLA, INC.; TESLA
MOTORS, INC.; U.S. SECURITY
ASSOCIATES; *et al.***

Defendants.

Case No. 3-19-cv-00413-LRH-WGC

**Declaration in Support of Plaintiff's
Motion to Compel Discovery Responses**

**DECLARATION OF NICHOLAS WOODFIELD IN SUPPORT OF
MOTION TO COMPEL PRODUCTION OF DISCOVERY**

I, Nicholas Woodfield, being over the age of eighteen, based on my personal knowledge of the following facts and pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a principal and general counsel at The Employment Law Group, P.C., a Washington, D.C. based employment litigation law firm, and I am competent to testify about the matters contained herein.

2. I am counsel of record for Karl Hansen, the plaintiff in the above-referenced proceeding. I am submitting this declaration in support of Mr. Hansen's motion to compel the production of discovery.

3. A true and correct copy of Plaintiff's First Interrogatories to Defendants, served on February 20, 2020, is attached hereto as Ex. A.

4. A true and correct copy of Plaintiff's First Requests for Production to Defendants, served on February 20, 2020, is attached hereto as Ex. B.

5. A true and correct copy of the Tesla Parties' Responses to Plaintiff's First

Interrogatories and Requests for Production to Defendants, served on March 20, 2020, is attached hereto as Ex. C.

6. A true and correct copy of USSA's Responses to Plaintiff's First Interrogatories to Defendants, served on March 23, 2020, is attached hereto as Ex. D.

7. A true and correct copy of USSA's Responses to Plaintiff's Requests for Production to Defendants, served on March 23, 2020, is attached hereto as Ex. E.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE INFORMATION AND BELIEF.

April 17, 2020
Date

Nicholas Woodfield
Nicholas Woodfield